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Attorneys for Plaintiff JESSE ROMERO, individually,  
on behalf of others similarly situated, and on behalf of  
Aggrieved Employees pursuant to the  
California Private Attorneys General Act

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

JESSE ROMERO, individually and on behalf  
of others similarly situated,

Plaintiff,

vs.

CALIFORNIA CLOSET COMPANY, a  
California corporation; CAL CLOSET  
RETAIL, INC., a Delaware corporation; and  
DOES 1 through 25, inclusive,

Defendants.

Case No.: 23STCV27355 (related to Case No.  
23STCV31746)

*The Hon. Lawrence Riff, Department 7*

**DECLARATION OF PLAINTIFF JESSE  
ROMERO IN SUPPORT OF MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION AND PAGA SETTLEMENT**

Date: January 29, 2025

Time: 10:00 a.m.

Dept.: 7

Complaint Filed: November 7, 2023

FAC Filed: October 10, 2024

Trial Date: None Set



1           6.       I understood that in the event this matter did not settle and proceeded to trial, I would  
2 need to respond to formal discovery, attend a deposition, and be in court to participate in the trial. I  
3 was ready to perform that role, as well as fulfill any other responsibilities necessary for this lawsuit.

4           7.       I took a considerable risk by bringing and pursuing this lawsuit for several reasons.  
5 First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I also  
6 understood there was a risk of losing any current job and/or income due to the time that I would have  
7 to spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed.  
8 Most importantly, I believe that by pursuing this case, I have taken a significant risk because future  
9 employers can easily find out that I sued my prior employer, and that may negatively impact my ability  
10 to find employment within this industry – and even outside of it – in the future. In contrast, the other  
11 employees who will be receiving money from this lawsuit did not have to file a claim or take the risk  
12 that I took in bringing this action.

13           8.       I reviewed the settlement agreement, discussed the settlement agreement with my  
14 attorneys, and asked them questions before signing it.

15           9.       I believe that I have done everything that my attorneys have asked of me and tried, to  
16 the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California.  
17 In total, I have spent approximately 30 to 35 hours participating in this case as described above. I  
18 believe my efforts helped get the result obtained in this case.

19           10.      I understand that any resolution of this lawsuit on a class wide basis is subject to court  
20 approval, and any settlement must be in the best interest of the Class as a whole. At all times  
21 throughout the course of this litigation I have considered the interests of the Class and put them before  
22 my own personal interests.

23           11.      I understand that incentive or enhancement awards are discretionary and intended to  
24 compensate named plaintiffs for the quality and quantity of the work done on behalf of the class and  
25 other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA  
26 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe  
27 my work in this matter warrants a modest incentive award for the reasons set forth above.

28           12.      I respectfully request that the Court approve the Settlement and an Enhancement

1 Payment in the amount of \$7,500.00 for my efforts and active participation in the case and for the  
2 broader, general release of all claims that I have or may have against California Closet Company and  
3 Cal Closet Retail, Inc., in connection with the settlement. Taking into consideration the time that I  
4 dedicated to this case and favorable terms of the settlement, I believe that this amount is reasonable.  
5

6 I declare under penalty of perjury under the laws of the State of California that the foregoing  
7 is true and correct. Executed on 12/09/2024, at Bellflower, California.  
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